

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN UNIVERSITY OF ANTIGUA –
COLLEGE OF MEDICINE,

Case No.: 14-CV-8410-DLC/GWG

Petitioner,

-against-

LEEWARD CONSTRUCTION COMPANY, LTD. ,

**NOTICE OF CROSS-MOTION
TO DENY ENFORCEMENT,
VACATE OR MODIFY
ARBITRATION AWARD**

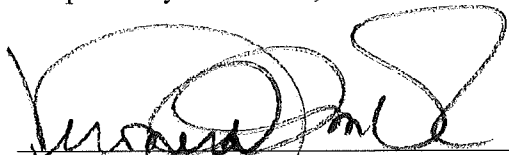
Respondent.
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PLEASE TAKE NOTICE that, on a time and date to be set by the Court, or as soon thereafter as counsel may be heard, Respondent Leeward Construction Company, Ltd. (“Respondent”) shall cross-move before the Honorable Denise L. Cote, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order denying enforcement, vacating or modifying the Final Partial Award, dated September 18, 2014, and reinstating Respondent’s claim pursuant to the Federal Arbitration Act, 9 U.S.C. §§1, *et seq.* and the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Respondent shall rely upon its Memorandum of Law in Support of Cross-Motion to Deny Enforcement, Vacate and/or Modify and in Opposition to the Petition and Motion to Confirm Arbitration Award, the Declaration of Veronica A. McMillan (with exhibits) submitted herewith as well as the exhibits submitted with the Petition, filed October 21, 2014, and Affirmation of Leonard A. Sclafani in Support of the Petition/Motion for Confirmation of, and for Judgment on, an Arbitration Award, dated November 20, 2014.

Dated: December 11, 2014
Poughkeepsie, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Veronica A. McMillan', written over a horizontal line.

Veronica A. McMillan, Esq. (VM1107)

LEWIS & GREER, P.C.

Attorney for Respondent,

Leeward Construction Company, Ltd.

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